

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division
SARAH L. VUONG (CA Bar 258528)
Assistant Director
WILLIAM H. WEILAND (Mass. Bar 661433)
Senior Litigation Counsel
LAUREN BRYANT (NY Bar 5321880)
ANNA DICHTER (NJ Bar 304442019)
JEFFREY HARTMAN (WA Bar 49810)
CATHERINE ROSS (DC Bar 9007404)
AMANDA SAYLOR (FL Bar 1031480)
ERIC SNYDERMAN (VA Bar 99563)
Trial Attorneys
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et. al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et. al.*,

Defendants.

Case No. 3:25-cv-1766-EMC

Judge: Hon. Edward M. Chen

DECLARATION OF HEATHER MARTIN

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No. 3:25-cv-1766-EMC

1 I, Heather Martin, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

2 1. I am the Acting Deputy Chief of Staff at U.S. Citizenship and Immigration Services
3 (“USCIS”). The facts set forth herein are of my own personal knowledge.

4 2. I submit this declaration pursuant to the Court’s Order contained within ECF 161 stating:
5 “[t]he government shall immediately ask the 20 custodians at issue whether they used communication
6 means outside of government email and OneDrive with respect to the TPS decisions (e.g.,
7 nongovernment email, text messaging, hard drive)” and the Court’s concerns in its Order Regarding Use
8 of Non-Governmental Communications Methods, ECF 183.

9 3. On June 9, 2025, I asked the following custodians at USCIS: Andrew Davidson, Kika
10 Scott, Joseph Edlow, Samantha Deshommes, Connie Nolan, Thomas Perkowski, Jessica Robles, and
11 Emma Krichinsky, whether they used communication means outside of government email and OneDrive
12 (e.g., nongovernment email, text messaging, personal hard drive) with respect to the Haiti and
13 Venezuela TPS decisions. I also asked Jennifer Higgins, who has transferred to FEMA, the same. After
14 conducting a reasonable search, each of the aforementioned custodians answered “No.”

15 4. Amany Zeldin no longer works for USCIS pursuant to her separation from federal
16 service.

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18 Executed at Camp Springs, MD on this 10th day of June, 2025.

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21 _____
22 Heather Martin
23 Acting Deputy Chief of Staff
24 U.S. Citizenship and Immigration Services
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